

presented the check for payment to Plaintiff Spratt Savings Bank, but that the payee on the check was altered from Pike Engineering, LLC to “Stephen Pycraft.” *Id.* at ¶¶ 8-9. The Complaint asserts claims against JPMorgan for breach of warranty under Article 4 of the Uniform Commercial Code (“UCC”) and conversion under Article 3 of the UCC. *Id.* at ¶¶ 12-29.

3. This Notice of Removal is timely, in accordance with 28 U.S.C. § 1446(b)(1), because less than thirty (30) days have elapsed since JPMorgan was purportedly served with Plaintiffs’ initial pleading. JPMorgan was purportedly served with process in this action on March 5, 2025. *See* Exhibit A.

4. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon JPMorgan in said action is attached hereto as Exhibit A.

5. Venue for this removal is proper pursuant to 28 U.S.C. §1441(a), because the original action was filed in Chester County, South Carolina, which is within this District and Division, and Plaintiffs reside and/or are located in this Division and District. *See*, Compl., ¶¶ 1-2.

6. This is a civil action in which there is complete diversity of citizenship between Plaintiffs and JPMorgan. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1441 because it could have been filed in this Court under 28 U.S.C. § 1332.

7. JPMorgan is and was at the time of the filing of the Complaint a Delaware corporation with its principal place of business in New York. *See Dusek v. JPMorgan Chase & Co.*, 132 F. Supp. 3d 1330, 1335 (M.D. Fla. 2015). Thus, JPMorgan is a citizen of Delaware and New York for diversity purposes. *See* 28 U.S.C. § 1332(c)(1). Plaintiff Spratt Savings Bank is a South Carolina corporation with its principal place of business in South Carolina.¹ *See Exhibit B*. Plaintiff South Carolina I-77 Alliance, Inc. is also a South Carolina non-profit corporation with its principal place of business in South Carolina. *See*, Compl., ¶ 2. Therefore, Plaintiffs are both citizens of South Carolina. As a result, complete diversity of citizenship exists between Plaintiffs (South Carolina) and JPMorgan (Delaware and New York).

8. The amount in controversy in this action also exceeds \$75,000. Plaintiffs seek relief relating to an allegedly altered check in the amount of \$96,040.26. *See* Compl., ¶¶ 6 & 9. Plaintiffs also seek “compensation for expenses,” punitive damages and attorneys’ fees. *See* Compl., at ¶¶ 21-22, 29 and *ad damnum* clause. Thus, the amount in controversy in this action exceeds the jurisdictional requirement. *See* U.S.C. § 1332(a).

¹ The Complaint asserts that Spratt Savings Bank is a “federally chartered bank,” however, the South Carolina Secretary of State confirms that Spratt Savings Bank is actually a South Carolina corporation with its principal place of business in South Carolina. *Compare Exhibit B with* Compl. ¶ 1. But even if it were a “federally chartered bank,” diversity would still be present because Spratt Savings Bank’s main office is in South Carolina. *See Wachovia Bank v. Schmidt*, 546 U.S. 303, 307 (2006); *Exhibit B*.

9. Pursuant to 28 U.S.C. §1446(d), written notice of this Notice of Removal will be given promptly to the Plaintiffs by the undersigned counsel for JPMorgan, and copies of this Notice will be filed promptly with the Clerk of the Court for Common Pleas for Chester County, South Carolina.

10. This case is removed subject to and without waiver of any challenges that JPMorgan may have as to any claims or defenses that may be available to it.

WHEREFORE, PREMISES CONSIDERED, JPMorgan prays that this Court assume full jurisdiction over this action as provided for by law. JPMorgan further prays for general relief.

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